

Matthew S. Throop (VSB No. 87094)
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Counsel for Debtor

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re:) Case No. 19-35482-KLP
STEWART, Breandra Nicole,) Chapter 7
)
Debtor.)

EX PARTE MOTION FOR AN ORDER ADMITTING
DANIEL E. GARRISON PRO HAC VICE

Matthew S. Throop, Esq. (“Throop”), counsel to the debtor in the above-referenced chapter 7 case, hereby moves the Court on an *ex parte* basis to grant the admission *pro hac vice* of Daniel E. Garrison, Esq. of Protego Law, PLLC to act as counsel to Throop in connection with the “Notice and Motion (1) to Compel Cooperation with Trustee and Turnover of Information and (2) for an Order to Show Cause” (the “Motion”) filed at docket no. 28 by Chapter 7 Trustee Jennifer J. West (“Trustee”), and any proceedings that might ensue in this case where the bifurcated engagement structure, disclosures or fee of Throop may be at issue.

Mr. Garrison has particular and extensive experience in chapter 7 bifurcation, and offering debtors post-petition payment terms. A copy of his curriculum vitae is attached to the required “Application to Qualify as a Foreign Attorney under Local Bankruptcy Rule 2090-1(E)(3),” filed herewith as Exhibit “A.”

As required by Local Rule 2090-1(E)(3), Throop will serve as local counsel and accompany Mr. Garrison in all appearances, and sign all filings.

RESPECTFULLY SUBMITTED this 28th day of January, 2020,

/s/ Matthew S. Throop
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CERTIFICATE OF SERVICE

This is to certify, under penalty of perjury, that on January 28, 2020, the foregoing was emailed to:

Jennifer J. West, Esq.
Spotts Fain PC
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Kenneth N. Whitehurst, III
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Office of the United States Trustee
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/s/ Matthew S. Throop